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9 Attorneys for Defendants Jessica Cornish,  
10 UMG Recordings, Inc. (erroneously sued as  
Universal Music Group, Inc.) and Universal  
11 Republic Records, a division of  
UMG Recordings, Inc.

12  
13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 WILL LOOMIS, an individual,  
16 Plaintiff,

17 v.

18 JESSICA CORNISH, P/K/A JESSIE J,  
an individual; UNIVERSAL MUSIC  
19 GROUP, INC., a Delaware corporation;  
LAVA RECORDS LLC, a limited  
20 liability company; UNIVERSAL  
REPUBLIC RECORDINGS, business  
21 form unknown; and DOES 1 – 10  
INCLUSIVE,

22 Defendants.  
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CASE NO. CV 12-5525-RSWL(JEMx)

Hon. John E. McDermott

**STIPULATION FOR ENTRY OF  
PROTECTIVE ORDER**

Courtroom: C, 8th Floor

1 **STIPULATION**

2 This stipulation is entered between Plaintiff Will Loomis ("Plaintiff") and  
3 Defendants Jessica Cornish, UMG Recordings, Inc. (erroneously sued as Universal  
4 Music Group, Inc.) and Universal Republic Records, a division of UMG  
5 Recordings, Inc. ("Defendants") (collectively, the "Parties"), through their  
6 respective counsel of record.

7 Pursuant to Fed. R. Civ. P. 26(c), good cause exists for entry of the  
8 Protective Order, attached hereto and being concurrently lodged with the Court,  
9 because the Parties to this action: (1) have sought and expect to seek in the future  
10 the discovery of certain information in this action that is sensitive, private, and  
11 confidential, or that third parties required to get involved in discovery in this action  
12 might believe is sensitive, private, and confidential, including, but not limited to,  
13 (a) information concerning the amounts paid under and other terms in confidential  
14 contracts entered into by the parties with third parties, and the financial and other  
15 terms of contracts entered into by the parties that are competitively sensitive and  
16 that would harm the parties if such terms were disclosed to their competitor, (b)  
17 other information that constitutes proprietary information, confidential business  
18 information, information that a party or third party may need, for any business,  
19 employment or competitive purposes, to be protected from disclosure, (c) trade  
20 secrets, and/or information in which a party or any third party has a privacy  
21 interest, and (d) information that is subject to protection from disclosure, or  
22 limitation upon disclosure, under applicable law; (2) believe that unrestricted  
23 disclosure or dissemination of such Confidential Information will cause them some  
24 business, commercial, and privacy injury; (3) desire an efficient and practicable  
25 means to designate such information as CONFIDENTIAL or HIGHLY  
26 CONFIDENTIAL – ATTORNEYS' EYES ONLY and thereby help ensure its  
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1 continued protection against unwarranted disclosure or dissemination; and (4) have  
2 agreed to such means as set forth herein.

3 Therefore, the Parties request that the Court enter the [Proposed] Stipulated  
4 Protective Order in the form attached hereto.

5  
6 DATED: March 22, 2013

DATED: March 22, 2013

7 MITCHELL SILBERBERG &  
8 KNUPP LLP

ONE LLP

9 By: /s/ Elaine K. Kim  
10 Elaine K. Kim

By: /s/ Christopher W. Arledge  
Christopher W. Arledge

11 Attorneys for Defendants Jessica  
12 Cornish, UMG Recordings, Inc.  
13 (erroneously sued as Universal Music  
14 Group, Inc.) and Universal Republic  
15 Records, a division of UMG  
Recordings, Inc.

Attorneys for Plaintiff Will Loomis

16  
17 **Attestation Regarding Signatures**

18 I, Elaine K. Kim, attest that all signatories listed, and on whose behalf the  
19 filing is submitted, concur in the filing's content and have authorized the filing.

20 DATED: March 22, 2013

By: /s/ Elaine K. Kim  
Elaine K. Kim